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November 2, 1995

William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W. Room 222  
Washington, D.C. 20554

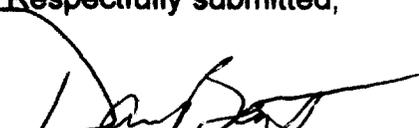
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Re: Ex Parte CC Docket No. 94-287

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Dear Mr. Caton :

On November 2, 1995 representatives of the Telecommunications Industry Association User Premises Equipment Division ("TIA"), specifically Dan Bart, Vice President TIA, Tony Caggiano of AT&T, and Martin Moody of Telident, met with Alan Alden Thomas of the FCC staff to review TIA's filing in the above-referenced docket. These individuals outlined the attached viewgraphs for Mr. Thomas. In the course of the discussion, the member of the FCC staff requested that TIA prepare additional material elaborating on specific points discussed.

Respectfully submitted,

  
Dan Bart  
Vice President, Standards and Technology

Attachment

cc: Alan Alden Thomas

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Representing the telecommunications industry in  
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TIA EX PARTE WITH FCC CONCERNING RM-8143 IN CC DOCKET 94-237: SUPPORT OF ENHANCED 911 CALLING

REV 3/95

# Overview: Summary of TIA Position

## ● Most Regulations Should be Aimed at MLTS Installations: (Part 64 ?)

- » MLTS support via adjunct equipment should be allowed
- » Compliance deadlines for new vs. existing installations (1-3 years)
- » Installation certification requirements seem appropriate
- » Trunk access worked out with local safety agency (e.g. campus use)
  - prefer national standards (e.g. FIC 02RV2-O = ANSI T1.411-1995)
- » Some “grandfathering” and exceptions should be allowed (e.g. waiver?)
- » Caller instruction cards should be provided, when necessary
- » Database management responsibilities should be assigned

## ● Few MLTS Equipment Registration Requirements are Needed (Part 68):

- » New MLTS capabilities (e.g. 3-digit 911, fast routing, attendant notification)
- » Interface specifications, when present (e.g.. FIC 02RV2-O)
- » Include installation instructions for E911 support

## RM-8143 Rule Changes (Appendix C)

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- ✓ ● (amended) Authority Citation
- ✓ ● (amended) 68.1: Purpose
- ~ ● (amended) 68.3: Definitions
- ~ ● (amended) 68.106: Notification to Telephone Company
- ~ ● (new) 68.228: E 911 Trunk & Station Number Verification
- ✓ ● (amended) 68.308: Signal Power Limitations
- ? ● (new) 68.320: E911 Compatibility: Technical Standards

LEGEND:    ✓ = seems okay    ~ = some changes suggested    ? = serious concerns

## 68.3 Definitions

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- *Enhanced 911 Emergency Service Calling*: A telephone network capability that provides (as a minimum) Selective Routing of 911 calls and a display of caller information, including location and telephone number, on the video display terminal of the safety agent who answers the call.
- *Selective Routing*: The ability of the telephone network to route a 911 call to the appropriate PSAP, which is usually the one nearest the caller. Selective routing reduces emergency response time by minimizing the need for call transfers in areas that are served by more than one PSAP.
- *Public Safety Answering Point (PSAP)*: An agency responsible for answering 911 calls that originate within its designated area.

## 68.3 Definitions (continued-b)

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- *Multi-Line Telecommunication System (MLTS)*: A telephone switching system such as a Private Branch Exchange (PBX), Key Telephone System (KTS), Multi-Function (Hybrid) System, or Centrex Service that connects more than one telephone to the public telephone network.
- *Caller's Emergency Service Identification (CESID)*: A number assigned to a 911 call and transmitted as part of call set-up when *enhanced* 911 calling is available. CESID may be the directory phone number of a caller's phone, the billing phone number for the caller's phone, or some other pseudo-telephone number. For 911 calls from wireless and mobile phones, CESID is frequently a pseudo-telephone number assigned to the receiving antenna, which may change during the call if the caller is moving.
- *Emergency Response Location*: A well-defined area to which an emergency response team may be dispatched. The area must be defined well enough to permit the response team to locate the caller quickly. For example, the address of a multi-story building is normally not precise enough, but that address coupled with the floor number and room number (if appropriate) usually is.

## 68.3 Definitions (continued-c)

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- *Enhanced 911 Emergency Service Calling Compatibility:* Telephone equipment is compatible with Enhanced 911 Emergency Service Calling when it transmits CESID to the network OR when the telephone company already knows the proper CESID. (e.g. The telephone company usually knows the CESID for single-line residence and coin telephones and for MLTS phones installed in a single emergency response location.)
- *Dispersed Private Telephone System:* MLTS equipment that serves telephones dispersed over an area too large to be considered a single emergency response location. For example, some MLTS installations have phones located in different buildings many kilometers apart. It is important to note that the “dispersed” nature of a system is determined by how it is installed, not by how it is designed or manufactured.
- *911 CAMA Trunk:* A dedicated trunk for handling one-way (outgoing) calls from MLTS equipment to Enhanced 911 Emergency Service. The trunk uses Centralized Automatic Message Accounting (CAMA) protocol. It uses loop reverse-battery call supervision, and in-band Multi-Frequency (MF) tone signaling for called number and CESID transmission. (See ANSI T1.411)

## 68.106 Notification to the Telephone Company

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- This requirement might be more appropriate elsewhere (e.g. Part 64) rather than Part 68.
- Notification to the telephone company is appropriate, but coordination with the local safety agency is just as important and should be included.
- This section should allow exceptions (e.g. routing of 911 calls to campus security) when they are approved by the local safety agency.
- It should also allow waivers in special circumstances, and require instruction/warning cards on phones that do not support enhanced 911.
- It should assign responsibility to the MLTS owner/administrator for loading and maintaining the PSAP database with appropriate expediency.
- Reference to a 10-digit CESID should be omitted.

## 68.228 E911 Trunk and Station Number Verification

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- As with the previous item, this requirement might be more appropriate elsewhere (e.g. Part 64) rather than Part 68.
- Verification of MLTS installation support is important, but the proposed requirements are far too cumbersome. The person responsible for supervising the installation of MLTS equipment should verify support of enhanced 911 calling and provide a written notice of compliance.

## 68.320 E911 Compatibility: Technical Standards

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- Subsection a) should reference the requirements for a 911 CAMA trunk (i.e. ANSI T1.411-1995) for MLTS equipment that directly interfaces to that facility
- Subsection b) may be omitted since the 911 CAMA trunk standard referenced above contains the appropriate specifications.
- Subsection c) should be identified as a “desirable” capability for new equipment manufactured after some date. There are situations in which 3-digit 911 dialing might be inadvisable.
- Subsection d) should be omitted.  $P=0.01$  for 911 calls is meaningless.
- Subsection e) requiring attendant notification capability on new equipment seems okay.
- Subsection f) should be omitted. The use of adjunct equipment obviates the need for direct MLTS support of enhanced 911 calling.
- Subsection g) should be eliminated for the same reason. Furthermore, the labeling of non-compliant equipment may be confusing and misleading since the use of adjunct equipment may bring a system into compliance. Manufacturers should include instructions as to how to enable their equipment to support enhanced 911 calling.